

*United States Attorney
Southern District of New York*

March 3, 2023

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

Re: *United States v. Sayfullo Habibullaevic Saipov*, S1 17 Cr. 722 (VSB)

Dear Judge Broderick:

The Government respectfully submits its updated and annotated requests to charge and proposed verdict sheet for the penalty phase of the trial. For the convenience of the Court, we have added our edits to the defense redline submitted earlier this evening (Dkt. 756), which was tracked against the parties' September 16, 2022 submission (Dkt. 566). The Government's additional changes are shown in red, and our objections are in bold. Where we have not responded to a defense revision, we do not object to that edit.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ /s/
Andrew Dember
Amanda Houle
Jason A. Richman
Alexander Li
Assistant United States Attorneys

cc: Defense counsel (*by ECF*)